

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

VIRTAMOVE, CORP., : Case No.
Plaintiff, : 2:24-cv-00093-JRG
v. :
HEWLETT PACKARD ENTERPRISE
COMPANY :
Defendant. :

VIRTAMOVE, CORP., : Case No.
Plaintiff, : 2:24-cv-00064-JRG
v. :
INTERNATIONAL BUSINESS :
MACHINES :
Defendant. :

VIDEOTAPED DEPOSITION OF SUSAN CAMERON

VIA VIDEOCONFERENCE

THURSDAY, OCTOBER 10, 2024

10:04 a.m. - 5:17 p.m.

Pages: 1 - 233

Reported by: Leanne N. Kowalyk, AR, RCR, CSR(A)

Page 1

Deposition of SUSAN CAMERON held via
videoconference:

Pursuant to Notice, before James Neeson,
Commissioner for taking oaths in the Province of
Ontario.

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFFS:

KYLE CALHOUN, ESQUIRE

BRANDON BROWN, ESQUIRE

CHRISTINE LOGAN

GRANT RIGDON, ESQUIRE

Kirkland & Ellis

555 California Street, 27th Floor

San Francisco, CA 94104

Telephone: 415.439.1400

E-mail: kyle.calhoun@kirkland.com

ON BEHALF OF THE DEFENDANTS:

PETER TONG, ESQUIRE

Russ August & Kabat

4925 Greenville Avenue, Suite 200

Dallas, Texas 75206

Telephone: 310.826.7474

E-mail: ptong@raklaw.com

ALSO PRESENT:

PETER GOODALE, VIDEOGRAPHER

I N D E X

EXAMINATION OF SUSAN CAMERON: AFFIRMED	PAGE
CROSS-EXAMINATION BY MR. CALHOUN.....	8
REDIRECT EXAMINATION BY MR. TONG.....	213
CROSS-EXAMINATION BY MR. CALHOUN.....	221

noticing attorney.

MR. CALHOUN: Good morning. This is Kyle Calhoun from Kirkland & Ellis on behalf of defendant IBM. Joining me are my colleagues Brandon Brown, Grant Rigdon and Christine Logan, also from Kirkland & Ellis.

MR. TONG: This is Peter Tong from Russ August & Kabat on behalf of the plaintiff VirtaMove Corporation.

THE VIDEOGRAPHER: Okay. Will the commissioner of oaths please swear in or affirm the witness, and then counsel may proceed.

MR. NEESON: Good morning. For the record, my name is James Neeson. To the witness, could you please identify yourself, state and spell your name for the record.

A. Susan Hedwig Cameron, S-u-s-a-n H-e-d-w-i-g C-a-m-e-r-o-n.

MR. NEESON: Thank you very much. Could you please raise your right hand.

SUSAN CAMERON: AFFIRMED.

MR. NEESON: Are there any objections to the affirmation? Hearing no objections, the witness has been sworn. Counsel, you may proceed. I wish everyone a good day.

1 A. I think it was 2011.

2 Q. So you weren't actually there
3 working for AppZero when the demand letter was
4 sent; correct?

5 A. No.

6 Q. So you don't have any firsthand
7 knowledge of what happened in terms of the demand
8 letter going out; correct?

9 A. Correct.

10 Q. Are you an attorney?

11 A. No.

12 Q. Do you know if that demand letter
13 related to copyright issues?

14 A. I don't know.

15 Q. Do you have knowledge one way or
16 the other if the lawsuit between AppZero and
17 AppFirst related more to patents or more to
18 copyrights or more to trade secrets?

19 MR. CALHOUN: Objection. Form.

20 A. Without having looked at the
21 letter, I don't think I can say. I don't know.

22 Q. You had mentioned that you spoke
23 with Nigel Stokes in preparing for this deposition
24 today; correct?

25 A. Yes.

REPORTER'S CERTIFICATE

I, Leanne N. Kowalyk, AR, RCR,
CSR(A), Certified Shorthand Reporter, certify;

That the foregoing proceedings were
taken before me at the time and place therein set
forth, at which time the witness was put under oath
by me;

That the testimony of the witness
and all objections made at the time of the
examination were recorded stenographically by me
and were thereafter transcribed;

That the foregoing is a true and
correct transcript of my shorthand notes so taken.

Dated this 11th day of October, 2024.



Leanne N. Kowalyk, AR, RCR, CSR(A)

CERTIFIED REALTIME REPORTER